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*Attorneys for Terremark
WorldWide, Inc., Manuel
Medina, and Jose Segrera*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STRATEGIC GROWTH INTERNATIONAL, INC.,	:
	:
Plaintiff,	:
	:
-against-	:
	:
TERREMARK WORLDWIDE, INC.,	:
MANUEL MEDINA, and JOSE SEGRERA,	:
	:
Defendants.	:
----- X	

Case No.: 07 CIV 5647 (KMK)

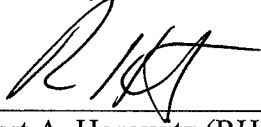
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Affidavit of David Freedman, sworn to on June 25th, 2007, together with the exhibits annexed thereto, the accompanying memorandum of law served and filed herewith, and all prior pleadings and proceedings, Defendants Terremark Worldwide, Inc. ("Terremark"), Manuel Medina and Jose Segrera ("Defendants") will move this Court, before the Honorable Richard J. Sullivan on a date and time designated by the Court, or as soon thereafter as counsel may be heard, for an order staying or dismissing this action in favor of the prior pending action Terremark filed against Strategic Growth International, Inc. in the Circuit Court for the 11th Judicial District of Florida; alternatively, dismissing the action in its entirety as to Manuel Medina and Jose Segrera pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(3),

and dismissing each of Plaintiffs' claims as to all Defendants, except for the declaratory judgment claim asserted against Terremark, pursuant to Fed. R. Civ. P. 12(b)(6), and granting such other and further relief as the Court may deem just and proper. Oral argument will be on a date and at a time designated by the Court.

Dated: New York, New York
November 30, 2007

Respectfully submitted,

By 
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